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9 *Attorneys for Michael Goldberg,
10 Trustee of the PFI Trust*

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

Case No. 20-30604
(Jointly Administered)

11 PROFESSIONAL FINANCIAL

Chapter 11

12 INVESTORS, INC., *et al.*,

Adv. Proc. No. 24-03034

13 Debtor.

14 Michael Goldberg, Trustee of the PFI Trust,
15 Plaintiff,
16 v.
17 Leslie Michelle Wallach, Manuel A. Romero,
18 and Charlene Albanese,
19 Defendants.

**STATUS REPORT AND THIRD
STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO FIRST
AMENDED COMPLAINT**

20 This Status Report and Third Stipulation for Extension of Time to Respond to First
21 Amended Complaint is entered into by and between Michael Goldberg, the duly appointed Trustee
22 (“*Trustee*” or “*Plaintiff*”), Leslie Michelle Wallach (“**Defendant Wallach**”), Manuel A. Romero
23 (“**Defendant Romero**”), and Charlene Albanese (“**Defendant Albanese**”) by and through the
24 undersigned attorneys of record.

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RECITALS

WHEREAS Plaintiff filed its *First Amended Complaint for Damages for Breach of Fiduciary Duty, And To Equitably Subordinate Claims Pursuant to 11 U.S.C. Section 510(c)(1)* (the “First Amended Complaint”) on February 21, 2025; and

WHEREAS the Court established in its Summons a responsive pleading deadline to the First Amended Complaint of March 31, 2025; and

WHEREAS, the parties concluded a successful mediation on June 24, 2025 before the Honorable Craig Karlan; and

WHEREAS each of the parties has signed a Settlement Agreement with Mutual General Releases that contemplates the execution of a Request for Dismissal With Prejudice as soon as certain consideration changes hands among the parties; and

WHEREAS the parties expect all such consideration will be exchanged within the next 45 days,

NOW, THEREFORE, the parties hereto stipulate and agree as follows:

STIPULATION

1. The defendants' response deadline with respect to First Amended Complaint shall be extended indefinitely pending the filing of a Request for Dismissal with Prejudice or such other pleading as any party may choose to advise the Court of the current status of this matter.

3. When all consideration has been exchanged and all conditions precedent have been satisfied under the Settlement Agreement, Plaintiff shall promptly file a Request for Dismissal with Prejudice.

Dated: June 26, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ John D. Fiero
John D. Fiero

*Attorneys for Michael Goldberg,
Trustee of the PFI Trust*

1 Dated: June 25, 2025

FREEMAN, MATHIS & GARY

2 By /s/ Lynn Dean
3 Lynn Dean

4 *Attorneys for Charlene Albanese*

5 Dated: June 25, 2025

6 WINGET, SPADAFORA & SCHWARTZBERG, LLP

7 By /s/ Alexis King
8 Alexis King

9 *Attorneys for Leslie Michelle Wallach*

10 Dated: June 25, 2025

11 TADJEDIN THOMAS & ENGBLOOM LAW GROUP

12 By /s/ Wendy Thomas
13 Wendy Thomas

14 *Attorneys for Manuel Romero*

1 STATE OF CALIFORNIA)
2 CITY OF SAN FRANCISCO)

3 I, Oliver Carpio, am employed in the city and county of San Francisco, State of California.
4 I am over the age of 18 and not a party to the within action; my business address is One Sansome
5 Street, 34th Floor, Suite 3430, San Francisco, CA 94104-4436.

6 On June 26, 2025, I caused to be served the following document in the manner stated below:

- 7 • ***STATUS REPORT AND THIRD STIPULATION FOR EXTENSION OF TIME TO
RESPOND TO FIRST AMENDED COMPLAINT TO ALLOW FOR MEDIATION***

<input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On <u>June 26, 2025</u> , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below
<input type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. On _____, under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
<input checked="" type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.

17 I declare under penalty of perjury, under the laws of the State of California and the United
18 States of America that the foregoing is true and correct.

19 Executed on June 26, 2025 at San Francisco California.

20 _____
21 Oliver Carpio

1 **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- 2 • John D. Fiero jfiero@pszjlaw.com, ocarpio@pszjlaw.com
3 • Alexis T. King king.a@wssl.com, gil-lopez.j@wssl.com

4 **TO BE SERVED VIA EMAIL:**

5 David Taylor 6 Keller, Benvenutti & Kim LLP 7 Email: dtaylor@kbkllp.com 8 <i>Attorneys for Charlene Albanese</i>	9 Alexis King 10 Winget, Spadafora & Schwartzberg, LLP 11 Email: king.a@wssl.com 12 <i>Attorneys for Leslie Michelle Wallach</i>
13 Wendy Thomas 14 Tadjedin Thomas & Engbloom Law Group 15 Email: wendyt@ttelawgroup.com 16 <i>Attorneys for Manuel Romero</i>	17 Lynn Dean 18 Freeman, Mathis & Gary 19 Email: lynn.dean@fmglaw.com 20 <i>Attorneys for Charlene Albanese</i>